

# Michael Faillace & Associates, P.C.

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May 2, 2025

**VIA ECF**

Hon. Judge Peggy Kuo  
United States District Judge  
Eastern District Of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: 23-cv-02802-ENV-PK; Gutama v. Whitestone Air Inc. et al (EDNY)

Dear Judge Kuo:

We write in response to the Court's Order to Show Cause dated May 1, 2025. To provide some context, CSM Legal was originally retained by Plaintiff to work on collecting Plaintiff's judgment. Mr. Barton was of counsel to CSM Legal and working on this case, which is why he was on the docket.<sup>1</sup> When Mr. Faillace returned to practice, he rejoined CSM Legal, took ownership of the firm and changed its name to Michael Faillace & Associates. Catalina Sojo, who owned CSM Legal, is leaving the firm. As such, we thought it appropriate to get the client's consent to the change in ownership and representation, and to file the consent on the record. Additionally, before the client consented to the change, we provided him a detailed description of Mr. Faillace's background, both in English and in Spanish, attached hereto as Exhibit A. Mr. Faillace's intention in filing the consent was not to replace Mr. Barton as counsel, but rather to make a record of the firm's change and the client's consent as discussed.

We apologize for not submitting a letter originally making this clearer, and respectfully request the Court allow Michael Faillace & Associates to substitute for CSM Legal.

Respectfully,

/s/ Michael Faillace  
Michael Faillace

/s/ Jesse S. Barton  
Jesse S. Barton

Encl.

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<sup>1</sup> Mr. Barton is currently of counsel to Michael Faillace & Associates.